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Attorneys for Complainant

**BEFORE THE
PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the First Amended Accusation
Against:

SANDHYA DHARMADAS, P.T.

Physical Therapist License No. PT 25688,
Respondent.

Case Nos. 1D-2004-64021

OAH No. N20060300612

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
above-entitled proceedings that the following matters are true:

PARTIES

1. Steven K. Hartzell (Complainant) is the Executive Officer of the Physical
Therapy Board of California. He brought this action solely in his official capacity and is
represented in this matter by Bill Lockyer, Attorney General of the State of California, by Deputy
Attorney General Vivien H. Hara.

2. Respondent Sandhya Dharmadas (Respondent) is represented in this
matter by Steven B. Bassoff, Esq., 1220 "S" Street, Suite 100, Sacramento, California 95814.

3. On November 30, 2000, the Physical Therapy Board of California issued
Physical Therapist License No. PT 25688 to Respondent. This license will expire on February
29, 2008, unless renewed.

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1 physical therapist assistant Nelson M. Tumanda to provide a progress report, in violation of Title
2 16 California Code of Regulations section 1398.44(d). These admissions are limited to these
3 proceedings and to any other administrative proceedings pertinent to professional licensure and
4 shall not be admissible in any civil or criminal proceedings.

5 9. Respondent agrees that her Physical Therapist License is subject to
6 discipline and she agrees to be bound by the Physical Therapy Board of California's imposition of
7 discipline as set forth in the Disciplinary Order below.

8 CONTINGENCY

9 10. This stipulation shall be subject to approval by the Physical Therapy Board
10 of California. Respondent understands and agrees that counsel for Complainant and the staff of
11 the Physical Therapy Board of California may communicate directly with the Board regarding
12 this stipulation and settlement, without notice to or participation by Respondent. By signing the
13 stipulation, Respondent understands and agrees that she may not withdraw his agreement or seek
14 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
15 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
16 Order shall be of no force or effect except for this paragraph, it shall be inadmissible in any legal
17 action between the parties, and the Board shall not be disqualified from further action by having
18 considered this matter.

19 11. The parties understand and agree that facsimile copies of this Stipulated
20 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same
21 force and effect as the originals.

22 12. In consideration of the foregoing admissions and stipulations, the parties
23 agree that the Board may, without further notice or formal proceeding, issue and enter the
24 following Disciplinary Order:

25 DISCIPLINARY ORDER

26 IT IS HEREBY STIPULATED AND AGREED, based upon the above
27 stipulations and recitals, that the Board, upon its approval of the Stipulation herein set forth, may
28 without further notice, enter a Decision whereby Respondent, as holder of Physical Therapist

License No. PT 25688, shall, by way of letter from the Board, be publicly reprovod; provided, however, that said public reprovod is conditional upon Respondent's full compliance with the following conditions precedent:

1. WRITTEN EXAMINATION ON THE LAWS AND REGULATIONS GOVERNING THE PRACTICE OF PHYSICAL THERAPY. Within 90 days of the effective date of this decision, Respondent shall take and pass the Board's written examination on the laws and regulations governing the practice of physical therapy in California. If Respondent fails to pass the examination, she shall be suspended form the practice of physical therapy until a repeat examination is successfully passed.

2. COST RECOVERY The respondent is ordered to reimburse the Board the actual and reasonable costs of investigation and prosecution incurred by the Board in this matter in the amount of \$6,175.00. Said costs shall be reduced, however, and the remainder forgiven, if Respondent pays \$1,250.00 within ninety (90) days of the effective date of this Decision. In the event respondent fails to pay within ninety (90) days of the effective date of the Decision, the full amount of costs shall be immediately due and payable. Failure to pay the ordered reimbursement, or any agreed upon payment, may constitute a violation of the probation order. The filing of bankruptcy by Respondent shall not relieve Respondent of her responsibility to reimburse the Board. If Respondent is in default of her responsibility to reimburse the Board, the Board will collect cost recovery from the Franchise Tax Board, the Internal Revenue Service, or by any other means of attachment of eamed wages legally available to the Board. Failure to fulfill the obligation could also result in attachment to Department of Motor Vehicle registrations and or license renewals.

3. FAILURE TO COMPLY WITH ORDER. A material breach by Respondent of this order shall constitute unprofessional conduct and shall be a basis for further disciplinary action by the Board. In such circumstances, Complainant may reinstate the Accusation in Case No. 1D-2004-64021, file an amended accusation, and/or file a supplemental accusation alleging any material breach of this order by Respondent as unprofessional conduct.

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1 **OTHER MATTERS**

2 1. Upon full compliance with the conditions precedent set forth in this
3 Stipulation, Respondent's license shall be publicly reprovod by way of a letter from the Board,
4 which shall be in the same form as the letter attached hereto as Exhibit B.

5 2. It is not contrary to the public interest for Respondent to practice and/or
6 perform her duties as a physical therapist because she is subject to this disciplinary order. It is
7 not the intent of the Board that this order or the fact that Respondent has been publicly reprovod
8 shall be used as the sole basis for any third party payor to remove Respondent from any list of
9 approved providers.

10 **ACCEPTANCE**

11 I have carefully read and considered the Stipulated Settlement and Disciplinary
12 Order and have fully discussed it with my attorney, Steven B. Bassoff. I understand the
13 stipulation and the effect it will have on my Physical Therapist License. I enter into this
14 Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree
15 to be bound by the Decision and Order of the Physical Therapy Board of California.

16 DATED: August 28, 2006.

17
18 Original Signed By:
19 SANDHYA DHARMADAS
Respondent

20
21 I have read and fully discussed with Respondent Sandhya Dharmadas the terms
22 and conditions and other matters contained in the above Stipulated Settlement and Disciplinary
23 Order. I approve its form and content.

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25 DATED: September 1, 2006.

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27 Original Signed By:
28 STEVEN B. BASSOFF, ESQ..
Attorney for Respondent

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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Physical Therapy Board of California of the Department of Consumer Affairs.

DATED: September 4, 2006.

BILL LOCKYER, Attorney General
of the State of California

Original Signed By: _____
VIVIEN H. HARA
Deputy Attorney General

Attorney for Complainant

Exhibit A

First Amended Accusation No. 1D-2004-64021

BEFORE THE
PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the First Amended Accusation
Against:

SANDHYA DHARMADAS, P.T.

Respondent.

Case No. 1D-2004-64021
OAH No. N2006030612

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Physical Therapy Board of California, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on October 16, 2006.

It is so ORDERED September 14, 2006.

Original Signed By:

FOR THE PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
Donald A. Chu, PhD, P.T., President